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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

11 KITA HURVITZ, individually,

12 Plaintiff,

13 vs.

14 HARTFORD INSURANCE COMPANY OF
15 THE MIDWEST, HARTFORD CASUALTY
16 INSURANCE COMPANY, THE
17 HARTFORD FINANCIAL SERVICES
18 GROUP, INC., and DOES I through X
19 inclusive, and ROE CORPORATIONS I
20 thought X, inclusive,

21 Defendants.

Case No.: 2:21-cv-00617-RFB-DJA

**STIPULATION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S MOTION FOR
DECLARATORY RELIEF [ECF No. 9]**

(FIRST REQUEST)

19 Plaintiff, Kita Hurvitz ("Plaintiff"), and Defendant, Hartford Insurance Company of the
20 Midwest ("Defendant") (collectively the "Parties"), by and through their counsel of record, hereby
21 stipulate and agree as follows:

22 On May 20, 2021, Plaintiff filed her a Motion for Declaratory Relief. *See* ECF No. 9.
23 According to the related minute entry, a response would be due June 3, 2021. The Parties stipulate
24 that Defendant may have until July 5, 2021 to respond to the motion for declaratory relief.

25 The basis for the request is that Defendant is still reviewing and obtaining documents and
26 information related to this matter, and requires additional time to complete its investigation in
27 order to diligently and appropriately respond to the motion for declaratory relief.

28 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to

1 file its responsive pleading to Plaintiff's Complaint by 30 days to May 21, 2021.

2 This is the first stipulation for extension of time for Defendant to respond to Plaintiff's
3 Motion for Declaratory Relief. The extension is requested in good faith and is not for purposes of
4 delay or prejudice to any other party.

5 DATED this 25th day of May, 2021.

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7 WRIGHT, FINLAY & ZAK, LLP

LAW OFFICE OF JAMES J. REAM

8 /s/ Darren T. Brenner

/s/ James J. Ream

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12 Las Vegas, NV 89117

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13 *Company of the Midwest*

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16 IT IS SO ORDERED:

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20 **RICHARD E. BOULWARE, II**
21 **United States District Court**

22 DATED this 28th day of May, 2021.
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